

Talking points for May 25<sup>th</sup> call with AF Dr. TerMaath

**Goal: get AF to submit next EBR Workplan as Draft Final, instead of final, and allow technical team to continue discussions to try to resolve differences.**

- The Williams AFB Site 12 ROD Amendment selected SEE implementation followed by Enhanced Bioremediation, which will achieve RAO's (i.e., MCLs in groundwater) within 20 years.
  - "As for the original remedy, the expected outcome of the revised groundwater remedy is that concentrations of residual LNAPL in saturated soil and dissolved contaminants in groundwater will be reduced to levels that will no longer result in contaminant concentrations in groundwater exceeding cleanup levels. The revised groundwater remedy will achieve groundwater cleanup levels in an estimated 20 years." (Section 5.3 of the ROD Amendment).
- SEE was implemented at Site 12 for approximately 18 months before being discontinued prematurely.
- The Regulatory Agencies technical team used current overall site conditions, and current mass estimates obtained from the AF contractor (AMEC) and conducted a conservative model to estimate the remediation timeframe if EBR is implemented at the site under current conditions:
  - **Timeframe for remediating the lower water bearing zone is 30-50 years; 100-200 years in the upper water bearing zone, where most of the contaminant mass remains today.**
  - **Regulatory Agencies would consider this remedy failure.**
- There are at least 5 municipal water wells within 5 miles downgradient of the site, along with planned development.
- No transport modeling has been conducted to evaluate potential offsite migration of groundwater contamination.
- **AF needs to conduct transport modeling, using data from the site, to evaluate potential impacts to offsite wells from groundwater migration.**
- This is a complex and complicated site, and a complex and complicated remedial technology. The Regulatory Agencies do not want to run the risk of potential remedy failure in 15 years.
- Regulatory agencies have significant concerns about the efficacy of EBR, but want to work with AF in the hopes of resolving the issues without going to formal dispute:
  - **AF submit the next EBR Workplan as Draft Final, not Final;**
  - **Let technical team develop milestones and criteria for evaluating EBR in the short term to prevent remedy failure in the long term, and focus on AF developed Decision Tree.**

